

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LORELEY FINANCING (JERSEY) NO. 3  
LIMITED; LORELEY FINANCING (JERSEY)  
NO. 5 LIMITED; LORELEY FINANCING  
(JERSEY) NO. 15 LIMITED; LORELEY  
FINANCING (JERSEY) NO. 28 LIMITED; and  
LORELEY FINANCING (JERSEY) NO. 30  
LIMITED

Plaintiffs,

v.

WELLS FARGO SECURITIES, LLC; WELLS  
FARGO SECURITIES INTERNATIONAL  
LIMITED; WELLS FARGO BANK, N.A.;  
HARDING ADVISORY LLC; STRUCTURED  
ASSET INVESTORS, LLC; OCTANS II CDO  
LTD; OCTANS II CDO LLC; SAGITTARIUS  
CDO I LTD; SAGITTARIUS CDO I LLC;  
LONGSHORE CDO FUNDING 2007-3, LTD.; and  
LONGSHORE CDO FUNDING 2007-3 LLC,

Defendants.

No. 12-CV-3723 (RJS)

**ECF Case**

**NOTICE OF DEFENDANTS'  
MOTION TO DISMISS THE  
COMPLAINT PURSUANT TO  
FEDERAL RULES OF CIVIL  
PROCEDURE 12(B)(2) AND 12(B)(6)**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that upon (i) the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), (ii) the Declaration of Jayant W. Tambe and the exhibits annexed thereto, (iii) the Declaration of Toby Peregrine-Jones, and (iv) all prior proceedings and matters of record in this case, Defendants Wells Fargo Securities, LLC, Wells Fargo Securities International Limited, Wells Fargo Bank, N.A., Harding Advisory LLC, Structured Asset Investors, LLC, and Longshore CDO Funding 2007-3 Ltd., by and through their undersigned counsel, will move the Court before the Honorable Richard J. Sullivan, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New

York, New York 10007, at a date and time determined by the Court, for an order pursuant to the Federal Rules of Civil Procedure dismissing the Complaint, with prejudice, for (i) lack of personal jurisdiction as to Defendant Wells Fargo Securities International Limited, and (ii) failure to state a claim as to all Defendants.

Pursuant to the Court's July 17, 2012 Order, Plaintiffs' opposition papers, if any, shall be submitted no later than September 17, 2012, and Defendants' reply papers, if any, shall be submitted no later than October 1, 2012.

Dated: New York, New York  
July 31, 2012

Respectfully submitted,

/s/ Jayant W. Tambe

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/s/ Steven Molo

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*Attorneys for Defendant Harding Advisory LLC*

**CERTIFICATE OF SERVICE**

I certify that on July 31, 2012, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system. I also certify that a true and correct copy of the foregoing was sent to the following entities via first class mail:

Octans II CDO Ltd.  
Sagittarius CDO I Ltd.  
c/o Maples Finance Services Limited  
PO Box 1093, Boundary Hall  
Cricket Square  
Grand Cayman KY1-1102  
Cayman Islands

/s/ Jayant Tambe